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Joel.Belloni@usecology.com[Joel.Belloni@usecology.com];
jim.vigrass@usecology.com[jim.vigrass@usecology.com]
Cc: Nguyen, Lyndsey[Nguyen.Lyndsey@epa.gov]; Pellegrino, Carl[Pellegrino.Carl@epa.gov];
Kappelman, David[Kappelman.David@epa.gov]; Lisichenko, Peter[lisichenko.peter@epa.gov]; R.
Conway[R.Conway@WestonSolutions.com];
Robert.Croskey@WestonSolutions.com[Robert.Croskey@WestonSolutions.com];
frodriguez@gesoncall.com[frodriguez@gesoncall.com]; jkite@gesoncall.com[jkite@gesoncall.com]
From: Daly, Eric
Sent: Tue 1/10/2017 3:24:24 PM
Subject: NFB Site: GNBC Office Area Cubic Yard Boxes and Area 5 Medium Concentration Disposal
Proposal
[NFB US Ecology Area 5 Medium Recommended with Office Area High 01-09-201....pdf](#)

Good Morning:

Is there any word on the most recent blending proposal? We held off on adding the GNBC boxes to the load out today but are hoping to combine for tomorrow's load out.

Thanks

From: Daly, Eric
Sent: Monday, January 09, 2017 11:36 AM
To: 'tim.curtin@usecology.com' <tim.curtin@usecology.com>; 'tcurtin16@aol.com' <tcurtin16@aol.com>; 'joe.weismann@usecology.com' <joe.weismann@usecology.com>; 'Joel.Belloni@usecology.com' <Joel.Belloni@usecology.com>; 'jim.vigrass@usecology.com' <jim.vigrass@usecology.com>
Cc: Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Pellegrino, Carl <Pellegrino.Carl@epa.gov>; Kappelman, David <Kappelman.David@epa.gov>; Peter Lisichenko (lisichenko.peter@epa.gov) <lisichenko.peter@epa.gov>; Conway, R. Chad <R.Conway@WestonSolutions.com>; 'Robert.Croskey@WestonSolutions.com' <Robert.Croskey@WestonSolutions.com>; 'frodriguez@gesoncall.com' <frodriguez@gesoncall.com>; 'jkite@gesoncall.com' <jkite@gesoncall.com>
Subject: NFB Site: GNBC Office Area Cubic Yard Boxes and Area 5 Medium Concentration Disposal Proposal
Importance: High

Good Morning and Happy New Year to all!!!

Since December 19th we have been shipping out the Area 5 Medium Concentration Material from the NFB Site. All has been going well. We probably have about 30-40 more truckloads of that material. We still have GNBC cubic yard boxes with the higher concentration material. Lyndsey just returned from overseas and has created the next blend proposal based on our previous proposals and revision suggested by Joe (use all high soil sample values regardless if it is within the same sample point). This proposal is based on blending the Medium Concentration Material with the remaining GNBC cubic yard boxes. We would like to start this blend with the trucks tomorrow. As I wrote previously, overall concept of our blending has been approved as well as the previous blending calculations. This document is just specific to GNBC cubic yard boxes and the Area 5 Medium Concentration Material.

Please let us know if we are clear to start this shipment method tomorrow, 01/10/2017.

Thanks.

Regards,

Eric M. Daly
On-Scene Coordinator/Radiological Response Specialist
US Environmental Protection Agency- Region II

ERRD/RPB/PPS
2890 Woodbridge Avenue
Edison, NJ 08837
daly.eric@epa.gov
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately",
Benjamin Franklin

From: Daly, Eric
Sent: Thursday, December 15, 2016 7:55 PM
To: frodriquez@gesoncall.com; jkite@gesoncall.com; 'tim.curtin@usecology.com' <tim.curtin@usecology.com>; 'tcurtin16@aol.com' <tcurtin16@aol.com>
Cc: Joel.Belloni@usecology.com; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; joe.weismann@usecology.com; jim.vigrass@usecology.com; Pellegrino, Carl <Pellegrino.Carl@epa.gov>; Kappelman, David <Kappelman.David@epa.gov>
Subject: NFB Site: Area 5 Disposal Proposal
Importance: High

Good Evening:

Today we shipped out three trucks and all went pretty well after we worked out the bugs with the first truck. The overall concept of our blending has been approved as well as the TCLP for the areas of interest for this winter's planned shipments (GNBC Office Area and Area 5). Attached is the rad proposal for Area 5 medium concentration material. Hopefully, Joe is done with his training and available to review the document. We performed gamma survey of Area 5 as we separated the different concentration layers. We also collected samples. Those samples were analyzed by our on-site HpGe as well as Pace Laboratory (alpha Spec and 21 day in-growth lab data documents attached). There is also a table with both lab and HpGe results.

Some clarifications. Pace Lab takes all three sample jars of each sample #, combines, dries, pulverizes and homogenizes. Then portions of the samples are used to perform the 21 day in-growth gamma spec and alpha spec. The gamma spec jar is a different size than what we use for our gamma spec as well.

Therefore, we need to do some more work on getting an “apples to apples” comparison with our gamma spec and theirs. We will start that in January. So the gamma readings we obtained was from a sample that was predominately the unprocessed rock-like high gamma material. So this was not really a true representation of the entire sample collected and not comparable to the laboratory results. However, we want to be conservative so we are proposing to use our HpGe results in determining our disposal proposal. In this case, the medium concentration material does not require blending but meets the acceptance criteria on its own.

Please let us know tomorrow if this is acceptable and we can schedule trucks for this material on Monday, December 19, 2016. If not, we will be forced to shut down operations until we return to site in January. Meaning, disposal is the only work we can conduct after tomorrow.

Thanks so much.

Regards,

Eric M. Daly
On-Scene Coordinator/Radiological Response Specialist
US Environmental Protection Agency- Region II

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2890 Woodbridge Avenue
Edison, NJ 08837
daly.eric@epa.gov
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately",
Benjamin Franklin

From: tim.curtin@usecology.com / [<mailto:tcurtin16@aol.com>]

Sent: Wednesday, December 14, 2016 10:12 AM

To: frodriguez@gesoncall.com; jkite@gesoncall.com

Cc: Daly, Eric <Daly.Eric@epa.gov>; Joel.Belloni@usecology.com; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; joe.weismann@usecology.com; jim.vigrass@usecology.com

Subject: Re: NFB Site: Profile Finalization

Francisco, I will send this on to Jim Vigrass who is our Transportation Dir and your POC for ordering trucks, and I will call him as well

to see if tomorrow can be arranged.

I will ask Jim to circle back with you regarding the specifics of starting to ship tomorrow as well as any additional details. Please note

you will need to send orders for trucking needs to Jim directly to order trucks.

Thank you,

Tim Curtin

Dir. Sales & Mkt./USW Ecology

973.694.7525

tcurtin@usecoloy.com

-----Original Message-----

From: Francisco Rodriguez <frodriguez@gesoncall.com>

To: Janelle Kite <jkite@gesoncall.com>; Cory McMann <Cory.McMann@usecology.com>

Cc: Daly, Eric <Daly.Eric@epa.gov>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko <Peter.Lisichenko@WestonSolutions.com>; Joe

Weismann <joe.weismann@usecology.com>; Tim Curtin <tcurtin16@aol.com>; Tim Curtin
<tim.curtin@usecology.com>
Sent: Wed, Dec 14, 2016 10:03 am
Subject: RE: NFB Site: Profile Finalization

All,

I agree, " Good News!". Now comes the question, how soon can we expect to schedule trucks. As of right now, there are three truckloads ready to ship. The box numbers and location are included in the attachments sent out by Eric. If possible, could we schedule at least one truck for tomorrow morning, Thurs. 12/15. I realize this is short notice. The reason is we have people going into rotation and holiday schedules and we would like to be able to go through our onsite procedures screening trucks and documentation before our key personnel leave for the holidays. Additional material from Area 5 may be ready to ship as soon as Monday of next week. Lyndsey is currently working on instrumentation and screening procedure proposal for that material.

Thanks you,

Frank Rodriguez

Response Manager

Guardian Environmental Services

70 Albe Drive

Newark, DE 19702

frrodriguez@gesoncall.com

Cell: 302-803-1191

Office: 302-918-3070

Fax: 302-834-1959

From: Janelle Kite

Sent: Wednesday, December 14, 2016 9:09 AM

To: Cory McMann <Cory.McMann@usecology.com>

Cc: Daly, Eric <Daly.Eric@epa.gov>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Joe Weismann <joe.weismann@usecology.com>; Francisco Rodriguez <frrodriguez@gesoncall.com>; Tim Curtin <tcurtin16@aol.com>; Tim Curtin <tim.curtin@usecology.com>

Subject: Re: NFB Site: Profile Finalization

Good news!

Sent from my Verizon Wireless 4G LTE DROID

Cory McMann <Cory.McMann@usecology.com> wrote:

Thanks Eric,

I have set up the approval (L163014WDI) for Area 5 and the GNBC Office Building, if you could indicate those areas in section 14 of the manifest that will assist with the receiving process at WDI. You should see a price confirmation from Joel shortly.

Thanks

From: Daly, Eric [<mailto:Daly.Eric@epa.gov>]

Sent: Tuesday, December 13, 2016 5:21 PM

To: Cory McMann <Cory.McMann@usecology.com>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Joe Weismann <joe.weismann@usecology.com>; Francisco Rodriguez <frrodriguez@gesoncall.com>; Janelle Kite (jkite@gesoncall.com) <jkite@gesoncall.com>

Cc: Tim Curtin <tcurtin16@aol.com>; Tim Curtin <tim.curtin@usecology.com>

Subject: RE: NFB Site: Profile Finalization

Hi Cory:

Those were not the only areas that had elevated metal results from our site wide assessment. For example, ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, Chromium is at 280 mg/kg , Lead at 1300 mg/kg. That sample is from GNBC Warehouse #3. We aren't performing that part of the removal until the Spring the earliest. Presently we are only addressing the two areas that we are excavating now and need to get moving on with T&D. Each area we address moving forward will have additional rad analysis as described previously in our proposal and now TCLP analysis prior to anything being shipped off site.

Thanks

From: Cory McMann [<mailto:Cory.McMann@usecology.com>]
Sent: Tuesday, December 13, 2016 4:28 PM
To: Daly, Eric <Daly.Eric@epa.gov>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Joe Weismann <joe.weismann@usecology.com>; Francisco Rodriguez <frrodriguez@gesoncall.com>; Janelle Kite (jkite@gesoncall.com) <jkite@gesoncall.com>
Cc: Tim Curtin <tcurtin16@aol.com>; Tim Curtin <tim.curtin@usecology.com>
Subject: RE: NFB Site: Profile Finalization

Hi Eric,

Just one question on the TCLP data. You indicated the analysis represents Area 5 and the office. Were those the only areas that hit for totals in the data set over marked:

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg

ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg ,

Lead at 1300 mg/kg. This may be the one regarding the Trench you speak of below.

ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg

ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg

ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg

I am trying to relate what was above for totals to the TCLP analysis, are you expecting to run additional TCLP analysis for other areas?

Thanks

From: Daly, Eric [<mailto:Daly.Eric@epa.gov>]
Sent: Tuesday, December 13, 2016 11:56 AM
To: Cory McMann <Cory.McMann@usecology.com>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Joe Weismann <joe.weismann@usecology.com>; Francisco Rodriguez <frrodriguez@gesoncall.com>; Janelle Kite (jkite@gesoncall.com) <jkite@gesoncall.com>
Cc: Tim Curtin <tcurtin16@aol.com>; Tim Curtin <tim.curtin@usecology.com>
Subject: NFB Site: Profile Finalization
Importance: High

Good Morning Everyone:

We have been really busy. Slowly but surely making progress here at the site. We sent out samples from Area 5 and the GNBC Office for TCLP. Those results are attached. Thankfully, no results exceed the TCLP limits. With the acceptance of the GNBC Office blending disposal plan last month (attached) and now the clearance of the TCLP, we should be ready to start shipping the office area. Right now we have segregated the GNBC cubic hard boxes into three Conex Containers. Each container has 22 cubic yard boxes. 16 higher concentration boxes with 6 low concentration boxes as per the blending document. I have attached a truck loading document that breaks down the specific boxes (ID# and individual box weight).

We are still working with the lab to get data on Area 5. We may have some other proposals later utilizing the low level material we have from Area 5 to blend with the remainder of the high concentration cubic yard boxes from GNBC. Lyndsey may be calling Joe today if he is available.

Thanks

Regards,

Eric M. Daly
On-Scene Coordinator/Radiological Response Specialist
US Environmental Protection Agency- Region II

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2890 Woodbridge Avenue
Edison, NJ 08837
daly.eric@epa.gov
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately",
Benjamin Franklin

From: Cory McMann [<mailto:Cory.McMann@usecology.com>]
Sent: Tuesday, November 29, 2016 4:50 PM
To: Daly, Eric <Daly.Eric@epa.gov>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com; Joe Weismann <joe.weismann@usecology.com>

Cc: Tim Curtin <tcurtin16@aol.com>
Subject: RE: NFB Site: Profile Finalization

Thanks Eric,

It's difficult to negate the chromium results based on the blank results and since there are lead and barium concerns I recommend running TCLP for those constituents.

Joe, I know you approved the rad procedure are you waiting on additional analysis?

Cory

From: Daly, Eric [<mailto:Daly.Eric@epa.gov>]
Sent: Tuesday, November 29, 2016 12:52 PM
To: Cory McMann <Cory.McMann@usecology.com>; Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Cc: Tim Curtin <tcurtin16@aol.com>
Subject: NFB Site: Profile Finalization
Importance: High

Hi:

I apologize for the delayed response. I am in our REOC this week and addressing response issues. I understand. I actually have a write up that I always use. I wanted to make sure we were all on same page. I made a pdf of my cheat sheet and attached.

As I look closer to the data, I see a note on the chromium results "Compound was found in the blank and sample". **So I assume there was a cross contamination**

issue in the lab? Does that put in question all values for the chromium results?

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg, ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg, ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg, ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg, ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg?

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg . **For this sample the Rule of 20 would be 5.5 mg/l of lead with the limit being 5.0 mg/l.**

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg. **For this sample the Rule of 20 would be 215 mg/l of Barium with the limit being 100 mg/l.**

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg (**14 mg/l: 5.0 mg/l**), Lead at 1300 mg/kg (**65 mg/l: 5 mg/l**). This may be the one regarding the Trench you speak of below.

We will have a TCLP sampling strategy for the waste. At this time, we will only be sampling/analyzing the material we have excavated and plan to dispose. We need to put a rush on this analytical in order to get the disposal process moving. At a later date we will obtain TCLP information for other areas.

So as I understand it, our radiological procedures are approved but we just need to verify the RCRA characteristics.

Please let me know if there are any questions at this time.

Regards,

Eric M. Daly
On-Scene Coordinator/Radiological Response Specialist
US Environmental Protection Agency- Region II

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2890 Woodbridge Avenue
Edison, NJ 08837
daly.eric@epa.gov
908-420-1707

"We must, indeed, all hang together, or assuredly we shall all hang separately",
Benjamin Franklin

From: Cory McMann [<mailto:Cory.McMann@usecology.com>]
Sent: Tuesday, November 29, 2016 9:05 AM
To: Joel Belloni <Joel.Belloni@usecology.com>; Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Cc: Tim Curtin <tcurtin16@aol.com>
Subject: RE: NFB Site: Profile Finalization

Just to clarify, the total results divide by 20 are the hurdle based on the analysis provided. If TCLP analysis on representative sample(s) can be completed showing the levels below are not exceeded the waste can be accepted at WDI. However, if the analysis shows the waste exhibits a characteristic the waste can still be accepted for stabilization at MDI (with some profile modifications) and final disposal to occur at WDI.

Cory

From: Joel Belloni
Sent: Tuesday, November 29, 2016 8:52 AM
To: Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Cc: Cory McMann <Cory.McMann@usecology.com>; Tim Curtin <tcurtin16@aol.com>
Subject: RE: NFB Site: Profile Finalization

Chromium should be below 5 mg/L, Lead below 5 mg/L and Barium below 100 mg/L.

Joel D. Belloni

Technical Service Specialist

734.521.8015

734.589.9608 cell

joel.belloni@usecology.com

In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

From: Daly, Eric [<mailto:Daly.Eric@epa.gov>]
Sent: Tuesday, November 29, 2016 8:46 AM
To: Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Subject: NFB Site: Profile Finalization

Good Morning Everyone:

I hope everyone had a nice holiday. I am hoping to get back on track with our profile finalization. As far as the metals exceedance, we are working on a proposal for TCLP analysis. Joel, what regulatory levels are you referring to so we are all on the same page.

Thanks

From: Joel Belloni [<mailto:Joel.Belloni@usecology.com>]

Sent: Thursday, November 17, 2016 4:14 PM

To: Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>;
Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com

Subject: RE: Profile Finalization- Niagara Falls

ID: N001-SS001-1224-01, Lab Sample 160-13352-1, page 18, Chromium is at 1600 mg/kg

ID: N001-SS006-0012-01, Lab Sample 160-13352-6, page 23, Lead is at 110 mg/kg

ID: N001-SS007-0012-01, Lab Sample 160-13352-7, page 24, Barium is at 4300 mg/kg

ID: N002-SS001-0012-01, Lab Sample 160-13352-8, page 25, Chromium is at 210 mg/kg

ID: N002-TRENCH-0003-01, Lab Sample 160-13352-14, page 31, Chromium is at 280 mg/kg ,
Lead at 1300 mg/kg. This may be the one regarding the Trench you speak of below.

ID: N003-SS001-1022-1, Lab Sample 160-13352-15, page 32, Chromium is at 970 mg/kg

ID: N003-SS003-1224-01, Lab Sample 160-13352-17, page 34, Chromium is at 860 mg/kg

ID: N003-SS003-1224-02, Lab Sample 160-13352-18, page 35, Chromium is at 790 mg/kg

Thank you,

Joel D. Belloni

Technical Service Specialist

734.521.8015

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joel.belloni@usecology.com

In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

From: Daly, Eric [<mailto:Daly.Eric@epa.gov>]
Sent: Thursday, November 17, 2016 3:34 PM
To: Joel Belloni <Joel.Belloni@usecology.com>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>; Peter.Lisichenko@WestonSolutions.com; Robert.Croskey@WestonSolutions.com
Subject: RE: Profile Finalization- Niagara Falls

Hi Joel:

Could you please identify which samples you are referring to? If one result for high lead is the GNBC Warehouse 4 Trench Sample, we are aware and spoke about handling this one area separately. That was an oil drain and we took a sample there just for that purpose. That does not represent the entire Site. Please note, that area is not one of the areas planned to initially ship in 2016.

Thanks

From: Joel Belloni [<mailto:Joel.Belloni@usecology.com>]
Sent: Thursday, November 17, 2016 2:07 PM
To: Daly, Eric <Daly.Eric@epa.gov>; Nguyen, Lyndsey <Nguyen.Lyndsey@epa.gov>
Subject: Profile Finalization- Niagara Falls

Good Afternoon-

We have completed the review of the radiological portion of the analysis and we have an outstanding issue in regards to the RCRA component. In the analysis attached, there are several hits for Cadmium and Lead that are above regulatory levels. Since this analysis was ran in totals, some of the hits are not below the divide by twenty rule. Is there any TCLP analysis available? Would it be possible to pull a representative sample prior to shipping to show the codes don't apply?

Let me know your thoughts and we can wrap this up shortly.

Regards,

Joel D. Belloni

Technical Service Specialist

joel.belloni@usecology.com

p: 734.521.8015 | c: 734.589.9608 | f: 734.521.8142

17440 College Parkway Suite 300 Livonia, MI 48152

In observance of the Thanksgiving holiday, US Ecology will be closed on 11/24/2016 and 11/25/2016

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